

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

IN RE: WAREHOUSE 86, LLC  
DEBTOR

CASE NO. 08-03423 ee  
CHAPTER 7

**TRUSTEE'S OBJECTION TO CLAIM**

Chapter 7 Trustee, Kimberly R. Lentz, files this Trustee's Objection to Claim pursuant to Rule 3001 of the *Federal Rules of Bankruptcy Proceedings* and Rule 3007-1 of the *Uniform Local Rules* and states as follows:

1. Warehouse 86, LLC ("Debtor") filed for relief under Chapter 11 of the *Bankruptcy Code* on November 4, 2008. On December 3, 2010, the case was converted to a Chapter 7 proceeding. Kimberly R. Lentz is the Chapter 7 trustee ("Trustee") of the bankruptcy estate of the Debtor.

2. This Court has jurisdiction over this matter pursuant 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

3. **(BUDGET RENT A CAR SYSTEMS, LLC - CLAIM NO. 30-1)** The Trustee objects to Claim No. 30-1 filed by Budget Rent A Car Systems, LLC. in the amount of \$25,000.00 on the basis that the claim is contingent and unliquidated. The Trustee requests that Claim No. 30-1 be disallowed as a general unsecured claim.

WHEREFORE, PREMISES CONSIDERED, for the reasons set forth above, the Trustee requests that this Court disallow Claim No. 30-1 filed by Budget Rent A Car Systems, LLC. in the amount of \$25,000.00 and the Trustee requests any additional relief that may be just.

Respectfully submitted,  
KIMBERLY R. LENTZ, TRUSTEE

By: /s/ Kimberly R. Lentz  
KIMBERLY R. LENTZ, (BAR NO. 8986)

Of Counsel:

Lentz & Little, PA

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Gulfport, Mississippi 39502

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**CERTIFICATE OF SERVICE**

I, KIMBERLY R. LENTZ, do hereby certify that the following have been served electronically via ECF with a copy of the foregoing document:

United States Trustee : [USTPRegion05.JA.ECF@usdoj.gov](mailto:USTPRegion05.JA.ECF@usdoj.gov)

Christopher R. Maddux, Attorney for Debtor: [chris.maddux@butlersnow.com](mailto:chris.maddux@butlersnow.com)

John A. Crawford, Jr., Attorney for Debtor: [jack.crawford@butlersnow.com](mailto:jack.crawford@butlersnow.com)

Stephen W. Rosenblatt, Attorney for Debtor: [Steve.Rosenblatt@butlersnow.com](mailto:Steve.Rosenblatt@butlersnow.com)

I further certify that the following have been served with a copy of the foregoing document by U.S. mail, postage prepaid.

Warehouse 86, LLC.  
Post Office Box 16692  
Jackson, MS 39236

Budget Rent A Car Systems, LLC  
Basham & Scott  
Post Office Box 450676  
Houston, TX 77245

This the 13<sup>th</sup> day of July, 2011.

/s/ Kimberly R. Lentz  
KIMBERLY R. LENTZ